



Code of Conduct



Title Code of Business Conduct		Scope All KTPconTeyor (including K2Pak), Employees and Contractors
Document N° GP-GO-0001.04		Document class Operational
Revision Version No: V.04		Policy owner Tim Van Londersele, CFO
Issued date 01/07/2020	Revision date 10/09/2025	Approved by Orm Verberne, CEO

Revision History

Version	Date	Change Status	Author
V.01	01/07/2020	First issued version	Arielle Vander Perren
V.02	01/01/2021	Mission statement amended	Arielle Vander Perren
V.03	01/12/2023	Additional clauses Appendix updates incl. link to all related policies	Arielle Vander Perren
V.04	10/09/2025	Global KTPconTeyor policy	Tim Van Londersele

Table of Contents

Message from our CEO	5
Our mission	6
Our Core Values	6
• Care	
• Collaborate	
• Commit	
• Share	
• Solve	
What is expected from all of us?	7
Our People	8
• Human Rights	
• Workplace Safety	
• Violence	
• Equal Opportunity and Non-Discrimination	
• Employee Personal Information	
Our Company / Assets	11
• Protection and Proper Use of Company Assets	
• Accurate Record Keeping and Financial Reporting	
• Contract Management	
• Legal Proceedings	
• Confidential information and Intellectual Property	
• Information and Technology	
• Use of Social Media	
Our Customers & Partners	14
• Competition, Fair Dealings and Antitrust	
• Anti-Corruption, Bribery and Facilitation Payments	
• Trade and Export Laws	
• Fraud	
• Money Laundering	
• Gifts and Entertainment	
• Conflict of Interest	
• Counterfeit parts	
• Business Partners Relations	
• Detailed Ethical Guidelines	

Our World	20
<ul style="list-style-type: none">• Environmental Policy• Charitable and Political Activities	
Our goals until 2027	21
Scope of application	21
Roles and Responsibilities	21
Communication	21
Review Mechanism	22
Reporting – Whistleblower protection	22
Annex 1 Related policies	23
Annex 2 Management Board	24

◊ ACT WITH ABSOLUTE INTEGRITY

Dear Colleague,

From its inception, KTPconTeyor has been committed to a culture of integrity and ethical conduct. This culture has helped us develop a reputation of doing things the right way and delivering excellent products and services. Our success is built on this reputation.

Operating with integrity is essential to safeguarding our reputation and ensuring future success. This Code of Business Conduct is provided to help all of us make the right choices. The Code and our culture require each of us to act responsibly and to treat each employee, customer, supplier, shareholder, government, and the public, fairly and with the utmost respect. In short, it is about acting with integrity and doing the right thing. KTPconTeyor remains firmly committed to growing our global footprint through increased sales growth and returning value to its shareholders, but never at the expense of our integrity. This means walking away from business opportunities that may violate KTPconTeyor's commitment to doing the right thing, our Code, or the law. There is no right way to do the wrong thing.

The Code is our guide to what customers, suppliers, colleagues, shareholders, and communities expect of us, what we expect from them and ultimately, what we expect of ourselves. I encourage you to take the time to thoroughly read our Code. If you have any questions, ask for guidance. As you read the Code, remember that our hard-earned reputation of integrity and excellence demands that each of us always act with integrity and report any potential incidences of misconduct.



Orm Verberne
Chief Executive Officer,
KTPconTeyor

📍 OUR MISSION

“We bring value to our customers globally through the development and manufacturing of best in class, sustainable solutions for the packaging & storage of their products”.

📍 OUR CORE VALUES

At KTPconTeyor, our shared values guide how we work, interact, and grow—together. Following the merger, we have united around five core principles that define our culture and shape every decision we make:

Care

We care deeply about our people, our customers, and the communities we serve. We foster a respectful, inclusive, and safe environment where individuals are valued and supported. Caring is at the heart of how we build trust and long-term relationships.

Collaborate

We believe the best results come from working together. By fostering teamwork across departments, borders, and with our partners, we unlock creativity, solve problems faster, and build a stronger company.

Commit

We act with integrity and take responsibility for our actions. We honour our promises, stay accountable, and strive for excellence in everything we do. Commitment is how we earn trust and deliver lasting impact.

Share

We grow by sharing knowledge, experience, and success. We encourage open communication and transparent collaboration across all levels of the organization. Sharing empowers innovation and continuous learning.

Solve

We are solution-driven. Whether it's overcoming challenges or creating new opportunities, we approach problems with curiosity, agility, and determination. Solving for today while building for tomorrow is how we stay ahead and serve our customers better.

WHAT IS EXPECTED FROM ALL OF US?

The KTPconTeyor Code of Business Conduct is based on our core value “Commit”. This represents that we act with the highest integrity and take responsibility for our actions. Our Code applies to all employees, agents, contractors, directors, and officers from all entities within the KTPconTeyor. Our Code is meant to be used as a guide and it cannot anticipate and address every situation. It is important to remember that merely complying with the letter of the law may not be enough; we are expected to operate with absolute integrity in all our business operations.

Regardless of our position within the Company, we all have a duty to understand and adhere to the Code. We are expected to exemplify integrity every single day and our commitment to act with integrity crosses all borders. We are one KTPconTeyor with a shared obligation to protect our reputation. We believe that acting with integrity is not something you do solely for your public reputation, rather it means doing the right thing even when no one is watching.

We are also expected to meet the following additional responsibilities:

- Lead by example.
- Help to create a work environment that focuses on building relationships, recognizes effort, and values mutual respect and open communication.
- Be a resource for co-workers. Communicate to co-workers about how the Code and policies apply to their daily work.
- Be proactive. Look for opportunities to discuss and address ethics and challenging situations.
- Foster an environment where everyone feels comfortable asking questions about and reporting potential violations of the Code and policies.

As a global company, we must comply with all applicable work rules, laws, regulations, and policies that govern our activities around the world. Employees having a question regarding applicable law or policy or encountering a situation where local law appears to conflict with KTPconTeyor’s values, are expected to contact our Regional HR Manager. Our Company will take all reports of misconduct very seriously and will take appropriate actions after consistent, comprehensive, and -to the extent possible- confidential investigation. KTPconTeyor will not tolerate any retaliation against an individual who, in good faith, seeks advice, raises a concern, reports misconduct, or provides information in an investigation related to a suspected Code of Conduct. We truly believe that this process plays an important role in making our Company a great place to work

All employees, agents, contractors, directors, and officers of the Company are invited to acknowledge that they have read and understood our Code of Business Conduct and that they are in compliance with it.

All employees may encounter situations where the correct course of action is not immediately clear. To support ethical decision-making, we provide the following guiding questions:

- Is this action legal and compliant with KTPconTeyor's policies?
- Would I be comfortable if this decision was made public?
- Could this action harm our reputation or stakeholder trust?
- Am I being honest and transparent in this situation?
- Would I feel comfortable if this behaviour were directed at me?

Common examples:

- Acceptable: Declining a gift that could influence business decisions.
- Unacceptable: Sharing confidential pricing data with a competitor.
- Gray area: Receiving an expensive client gift before a contract is signed — consult your manager or the Compliance team.

Employees are encouraged to seek guidance from HR when in doubt.

While compliance is mandatory, KTPconTeyor also recognizes and encourages proactive ethical behaviour. Teams and individuals demonstrating exceptional commitment to ethical practices may be:

- Recognized in internal communications and meetings.
- Included in ethics-related improvement initiatives.

This positive reinforcement promotes a culture of trust, integrity, and transparency.

OUR PEOPLE

Our Company is committed to provide a safe, secure, and respectful environment, free from harassment and discrimination to all our employees across the world.

KTPconTeyor complies with all applicable employment, labour, and immigration requirements, and we expect all our employees to do the same.

HUMAN RIGHTS

Fundamental human rights are essential to us and we want to create an environment where people can freely contribute, perform, and are recognized for their achievements.

First of all, child labour, forced, bonded or indentured labour, involuntary prison labour, slavery or trafficking of persons is never acceptable and should not be tolerated in any stage of manufacturing, be it in our premises or in our partners' and sub-contractors' organizations.

Within KTPconTeyor we do respect the right of all workers to form and join trade unions, to bargain collectively and to engage in peaceful assembly as well as the right of workers to refrain from such activities.

We will also ensure compensation and benefits competitiveness in the markets in which we operate and alignment with industry standards as well as minimum wage requirements and working hours regulations.

Each of us can help support efforts to eliminate human rights abuses by reporting any suspicion or evidence of human rights abuses in our organization or in the operations of our business partners.

WORKPLACE SAFETY

Our commitment to safety is unconditional and is everyone's responsibility within KTPconTeyor. We therefore expect each of us to carefully follow all safety rules and procedures applying to our work but also to pay attention to our surroundings, to ensure contractors, customers or other people visiting our premises are briefed about safety in our organization to prevent any incident.

Maintaining a safe workplace means also that we never report to work under the influence of alcohol, illegal drugs, or any other substance that could hurt our ability to do our jobs safely. Use of these substances can prevent us from thinking clearly and can impair our judgment, which could be dangerous to ourselves and those around us.

We strive to keep our facilities incident-free and report and take corrective measures on any work-related injury, illness, near-miss, or unsafe condition, no matter how minor.

VIOLENCE

Violence in the workplace is unacceptable at KTPconTeyor. We are committed to ensuring that our employees, our contractors, and our customers work in safe and respectful environment that is free of violence, harassment, and bullying.

Any type of harassment, including physical, sexual, verbal, or other, is prohibited and can result in disciplinary action up to, and including, termination. Harassment can include actions, language, written words, or objects that create an intimidating or hostile work environment, such as yelling at or humiliating someone, physical violence or intimidation, unwanted sexual advances, invitations, or comments.

Bullying can include spreading malicious rumour or gossip, excluding, or isolating someone socially, intimidating someone, sending offensive jokes or emails, criticizing, or belittling someone constantly and many more inappropriate behaviours we will not tolerate.

If we ever see or know of any situation involving violence, threats, bullying, or intimidation, we help to protect our colleagues by reporting the incident immediately. If you are concerned about your immediate safety or that of others, contact local authorities in your area before you report the matter internally to the HR department.

EQUAL OPPORTUNITY AND NON-DISCRIMINATION

KTPconTeyor values diversity and inclusion and is a firm believer that our differences will make us stronger. The diversity in our opinions and ideas makes us better able to provide innovative solutions to our customers.

Because of this, we never make employment decisions based on legally protected personal characteristics such as age, race, gender, colour, religion, philosophical beliefs, political opinions, national origin, sexual orientation, disability, genetic information, pregnancy, veteran or military status, or trade unions membership. Our Company provides equal opportunities based on our skills and abilities, always striving to create a workforce that reflects the diversity of our communities.

Our employees are expected to do their part to help create an open, respectful, and collaborative culture by always keeping an open mind to new ideas and opinions, and by listening to the viewpoints of others.

EMPLOYEE PERSONAL INFORMATION

We respect the privacy of our employees and always treat private information with care. Data privacy laws cover how we must collect, store, use, share, transfer and dispose of personal information that is entrusted to us.

We should only collect, access, and use personal information for legitimate business purpose and keep it always private, personal, safe, and secure.

We expect all our employees to comply with those laws and report any violation or security breach of any system or device containing personal data.

To ensure accountability, KTPconTeyor will enhance monitoring of policy performance by:

- Conducting regular progress reviews of ethics-related goals.
- Tracking and reporting on key performance indicators (KPIs) such as:
 - Percentage of employees trained.
 - Number of confirmed ethics breaches.

PROTECTION AND PROPER USE OF COMPANY ASSETS

KTPconTeyor provides employees with various resources referred to as “Company Assets” and expects its employees to protect them from loss, damage, theft, waste, and improper use. These assets include but are not limited to physical facilities, equipment, tools, vehicles, inventory, supplies, computers and information systems, phones, confidential and proprietary information.

Suspected incidents of fraud, theft, negligence, and waste should be reported.

ACCURATE RECORD KEEPING AND FINANCIAL REPORTING

KTPconTeyor maintains a wide variety of records to provide our investors, business partners, and government agencies with complete, understandable, and reliable information about our business. It is therefore critical that our Company’s books and records are accurate, timely, complete and in compliance with applicable laws and accounting principles.

We build trust with our customers, regulators, and shareholders by ensuring all our records are created and maintained systematically so that we can find the information we need promptly. This applies equally to all kinds of documents, whether they are paper, electronic, or email. We observe any legal holds and preserve all records related to specific topics as requested by our legal department.

We fully comply with any requests from our internal and external auditors and provide them with the most accurate and timely information. We never mislead or attempt to influence any investigation, audit, or inquiry.

Although employees in financial and accounting roles have a special responsibility in this area, we do expect all our employees to contribute and ensure proper recording of business results and maintaining records.

CONTRACT MANAGEMENT

KTPconTeyor’s good reputation and trusted relationships with customers and suppliers around the world is dependent on our ability to follow through on the commitments we make on behalf of our Company. For this reason, it is crucial that in any situation where we bind our Company or create a legal obligation, every aspect must be properly approved and recorded.

Before engaging our Company in any contractual agreements, appropriate approvals will have to be obtained and employees will ensure proper reviews are completed with the legal and finance department before signatory authority is granted.

LEGAL PROCEEDINGS

KTPconTeyor's Legal department will appropriately respond to all formal legal claims and regulatory inquiries including summonses, complaints, official regulatory correspondence, or similar documents.

Employees should always connect with KTPconTeyor's Legal Department when receiving legal claims, complaints or summonses and never provide information related to these actions to external parties without prior review and written approval of our Legal Department.

CONFIDENTIAL INFORMATION and INTELLECTUAL PROPERTY

Confidential information exists in many forms from information kept in paper files, stored on computers, transmitted over networks, contained in video or printed format, stored on USB drives to simple phone conversations.

Protecting Company's confidential information and intellectual property is everyone's responsibility within KTPconTeyor. This duty remains even when leaving the Company. In doing so, we are helping to secure our business strategies, and processes as well as our competitive position in the marketplace.

To minimize the risks of an unintentional disclosure of sensitive information, we expect our employees to:

- Handle confidential information with care and precaution, according to any applicable contractual obligations and confidentiality terms.
- Disclose confidential information only when authorised and for legitimate business purpose.
- Protect confidential information from loss or theft by keeping it in locked cabinets, under password protected electronic files and avoiding discussing these topics in public places where one might be overheard, such as restaurants, airport terminals, and even Company break rooms.

Typical examples of confidential information are research and development ideas, patents, pricing and costing information, customer's lists and contractual terms, business plans, financial data, personal information.

If there is any doubt as to whether confidential information should be disclosed, seek advice from your manager or KTPconTeyor's legal Department.

INFORMATION AND TECHNOLOGY

KTPconTeyor provides IT resources - computer, networks, Internet, and email systems- for business purposes and expects its employees to:

- Protect these resources from loss, damage, theft and safeguard equipment and data against malicious acts by individuals inside or outside our Company.
- Respect copyright laws and appropriate software licensing terms.
- Use these in a responsible manner limiting the personal use to minimal and appropriate.

It is forbidden to use Company's computer systems and technologies to download, view, or send material that is illegal, offensive, or sexually explicit.

All information, data, and files on our Company's network belong to our Company, to the extent permitted by applicable law.

Inappropriate use of KTPconTeyor's technologies or electronic communications and suspicion of cyber-attacks should be reported to the management immediately.

USE OF SOCIAL MEDIA

Social media has changed the way we interact and do business. While KTPconTeyor respects the right of employees to use social media for personal and professional purposes it also requires all employees to comply with Company's policies and procedures when communicating on social media as it can affect Company's image and might create exposure to the Company's brand. We must keep in mind that what we post is likely a permanent, transferable record of communication that can be altered without our consent.

Employees are accountable for any information they publish online and are required to:

- Use good judgment and remember that any post can reflect on our Company's reputation.
- Reveal their relationship with the Company when commenting online on issues related to the Company.
- Respect the privacy of other employees and refrain from publishing photos of them without their consent.
- Ensure any information they post related to the Company is approved and accurate.
- Comply with the rules of the social media sites they use.

Any questions about who may communicate on a given issue, or whether a message is appropriate, should be addressed to KTPconTeyor's Marketing Communication Manager.

OUR CUSTOMERS AND PARTNERS

COMPETITION, FAIR DEALINGS AND ANTITRUST

KTPconTeyor believes in fair and open competition. Our competitive advantage comes from the quality of our products and services rather than from unethical and illegal business practices.

Our beliefs are supported by the various competition laws that govern relationships with competition, suppliers, distributors, and customers (known as “antitrust laws,” in some areas) around the world. While the legal requirements may vary in each location where we operate, all these laws generally share the same objective which is to prohibit formal and informal agreements between two competing companies for the purpose of unfairly restraining trade.

To protect our Company and operate within a fair and open marketplace, we must:

- Never talk with or provide our competitors with insights about our manufacturing capacity, our sales volumes, our pricing, our terms and conditions, our customers.
- Never make any agreement with a competitor that would restrict trade. Any coordination between our Company and our competitors can violate competition laws, even if it is based on an informal agreement.

Any question or concern related to this topic can be addressed to the Sales Managing Director or to KTPconTeyor’s Legal Department.

ANTI-CORRUPTION, BRIBERY AND FACILITATION PAYMENTS

KTPconTeyor is always committed to act lawfully and with integrity in all locations we do operate in.

The Company will abide by all the anti-corruption laws that apply to us in our various locations, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and the OECD Convention on Combating Bribery.

The Company will neither take part in any act of bribery, kickbacks, or improper payments to obtain or retain business, nor provide facilitation payments to expedite routine government actions or influence the judgement of a person.

We expect therefore our employees to:

- Select third parties carefully and monitor them continuously to ensure they comply with the Company’s anti-bribery policies.
- Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments.
- Refuse any offer or request for an unlawful payment and report the incident to the Company’s CFO.
- Report immediately any bribery or corruption tentative.

TRADE AND EXPORT LAWS

Many laws govern international trade and transactions across the world. These are designed to regulate imports and exports, to ensure that transactions are not being used for money laundering, and to prohibit companies from cooperating with unsanctioned boycotts.

As an international company, KTPconTeyor ships our products and materials across country borders daily and is committed to comply with such laws.

Employees involved in such international operations, including but not limited to logistics, finance, sourcing, regulatory or legal should make sure they are knowledgeable about trade control laws and comply with all associated requirements which include customs procedures, documentation, duties and taxes.

Questions or know violations related to these matters should be addressed to KTPconTeyor's Finance and Legal Department.

FRAUD

We are committed to conducting business with the highest standards of integrity and transparency. Fraud undermines our core values, damages trust and jeopardizes the success of our productions. Fraudulent activities covered by this policy include, but are not limited to:

- Financial Fraud: Misappropriation of funds, falsification of financial records, unauthorized use of company funds or assets, and fraudulent expense claims.
- Document Fraud: Submission of false or misleading documents, including invoices, receipts, contracts, or tax filings.
- Theft: Theft or embezzlement of physical or intellectual property, including equipment, costumes, scripts, or production materials.
- Bribery and Corruption: Offering, giving, or receiving bribes or other forms of improper inducements to influence business decisions.
- Contract Fraud: Falsifying or misrepresenting terms of contracts, agreements, or commitments made with clients, partners, vendors, or employees.
- Labor Fraud: Under-reporting of working hours, misclassification of employees, or fraudulent compensation practices.

To minimise the risk of fraud, we ensure that clear internal controls and procedures for handling financial transactions, approvals, and reporting are established. All financial records must be accurate, complete and transparent.

MONEY LAUNDERING

Money laundering is the process by which illegally obtained funds or assets are disguised as legitimate. The three stages of money laundering are:

- **Placement:** The introduction of illicit funds into the financial system (e.g., through deposits, payments, or investments).
- **Layering:** The process of concealing the origins of the funds by moving them through complex transactions or structures.
- **Integration:** The final stage, where the illicit funds are integrated into the legitimate economy and used for lawful purposes.

Money laundering often involves criminal activities such as fraud, corruption, drug trafficking, human trafficking, or terrorist financing.

At KTPconTeyor we ensure that no money laundering activities take place and will therefore establish a due diligence procedure.

GIFTS AND ENTERTAINMENT

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. KTPconTeyor is committed to winning business only on the merits of its products, services and people and complies with all legal requirements for giving and receiving gifts and entertainment.

Our employees should:

- Use sound judgment and comply with the law, regarding gifts and other benefits.
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships.
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the Company.
- Never accept cash, cash equivalents, stocks, or other securities
- Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide the same to customers and business partners.

When in doubt, employees should check with the CFO before giving or receiving anything of value.

CONFLICT OF INTEREST

A conflict of interest can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in the Company's best interests. Employees should avoid the types of situations that can give rise to conflicts of interest, but more importantly should disclose such situations so that there is never any impropriety in any of our business dealings.

It is important for our employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the Human Resources Department.

CONTERFEIT PARTS

As part of our commitment to ethical business practices, we recognize the importance of preventing counterfeit parts from entering our supply chain. Counterfeit parts pose significant risks to product quality, safety, and reliability. Therefore, we expect all employees, contractors, and suppliers to adhere to the following principles:

- **Vigilance and Due Diligence:**
 - o Exercise due diligence to prevent and detect the use of counterfeit parts.
 - o Implement robust processes and controls to verify the authenticity of components and materials.
 - o Regularly assess and update these processes to stay ahead of evolving threats.

- **Reporting and Cooperation:**
 - o Promptly report any credible evidence of counterfeit parts to the appropriate channels within the organization.
 - o Cooperate fully with internal investigations and external authorities to identify the nature and extent of any offenses.

- **Supplier Responsibility:**
 - o Hold our suppliers accountable for ensuring the authenticity of the parts they provide.
 - o Collaborate with suppliers to establish effective methods for detecting, reporting, and quarantining counterfeit components.

- **Continuous Improvement:**
 - o Foster an organizational culture that encourages ethical conduct and compliance with anti-counterfeit measures.
 - o Regularly review and enhance our practices to address emerging risks.

BUSINESS PARTNERS RELATIONS

Business partners are very important to us and to ensure an environment where both parties can be successful, we will only do business with partners having the same lawful and ethical behaviour. We hold our suppliers, distributors, independent agents, contractors, and business partners to the same high ethical standards we set for ourselves. For this reason, we conduct third-party due diligence to ensure that the payments we make to them are legitimate and will not be used for illicit purposes. If any third party is found to be engaging in corrupt acts while working on behalf of KTPconTeyor, we will take appropriate action.

DETAILED ETHICAL GUIDELINES

Anti-Corruption & Bribery

- Guideline: no employee, agent, or contractor may offer, solicit, or accept bribes, facilitation payments, kickbacks, or any improper advantage. Compliance with FCPA, UK Bribery Act, OECD standards is mandatory.
- Red Flags
 - o Payments routed through offshore or unknown intermediaries.
 - o Requests for 'expediting fees' from officials.
 - o Excessive hospitality or gifts during contract negotiations.
- Q&A Example
 - o Q: A government officer hints that our permit will move faster if we "help cover administrative costs." What should I do?
 - o A: This is a facilitation payment request and strictly prohibited. Refuse politely, record the incident, and report it to the CFO/Compliance.

Conflict of Interest

- Guideline: employees must disclose any personal, financial, or family interests that may compromise—or appear to compromise—their judgment.
- Red Flags
 - o Awarding contracts to a business owned by a relative.
 - o Holding undisclosed financial stakes in a supplier or competitor.
 - o External employment that overlaps with company business.
- Q&A Example
 - o Q: My spouse works for one of our vendors. Do I need to report this?
 - o A: Yes. Even if you are not directly managing the relationship, disclosure avoids any appearance of favouritism.

Money Laundering

- Guideline: the company prohibits disguising illegally obtained funds or assets. Employees must perform due diligence in line with trade and export laws.
- Red Flags
 - o Clients insisting on cash or cryptocurrency transactions without valid reason.
 - o Complex or unusual payment routes, especially across high-risk jurisdictions.
 - o Refusal to provide standard financial documentation.
- Q&A Example
 - o Q: A customer wants to pay a €500.000 invoice via multiple personal accounts. Is this acceptable?
 - o A: No. Fragmented payments from unrelated sources are a strong indicator of money laundering and must be escalated to Compliance.

Fraud

- Guideline: fraudulent activities include financial misrepresentation, falsification of records, theft, document manipulation, and unauthorized use of assets.
- Red Flags
 - o Duplicate or inflated invoices
 - o Unusual expense claims without receipts
 - o Employees bypassing approval procedures for financial transactions
- Q&A Example
 - o Q: I noticed a colleague regularly rounding up travel costs on expense forms. Should I report it?
 - o A: Yes. Even 'small' misrepresentations are fraud and must be reported to HR/Compliance.

Responsible Information Management

- Guideline: confidentiality, data protection, and secure use of IT systems are mandatory. Personal data must only be collected and stored for legitimate purposes.

- Red Flags
 - o Sharing sensitive data via unsecured channels
 - o Downloading files to unauthorized personal devices
 - o Discussing client data in public places

- Q&A Example
 - o Q: Can I transfer files to my private email to finish work at home?
 - o A: No. All work with confidential data must remain within company-approved secure systems.

OUR WORLD

ENVIRONMENTAL POLICY

The Company is committed to operating in an environmentally responsible manner, from the provision of products and services to the operation of its offices and facilities, selection of suppliers and other business activities.

In addition to complying with all applicable environmental laws and regulations KTPconTeyor drives responsible and sustainable actions to minimize any negative effects our operations may have on the environment and to continue to maximize our handprint from the solutions we develop. We look for ways to maximize our handprint through innovation, collaboration, and partnerships with our customers, suppliers, and stakeholders.

Further, we are all accountable for reporting any practice that is harmful to the environment, is unsafe, or does not comply with our Company's policies, applicable laws, or any other rule or regulation.

CHARITABLE AND POLITICAL ACTIVITIES

KTPconTeyor is proud to support civic and charitable activities in the countries we are operating in.

The Company believes in the right of employees to participate in charitable and political activities, however, unless it has been a Company supported charity initiative, employees active in such activities should do it on their own time and at their own expense.

Employees should never pressure any other employee, customer, or business partner to contribute or to support any of these activities.

📁 OUR GOALS UNTIL 2027

To strengthen the effectiveness of our business ethics objectives, KTPconTeyor applies the SMART framework (Specific, Measurable, Achievable, Relevant, Time-bound) to all targets:

- Specific: Clearly define the ethical issue being addressed.
- Measurable: Use quantitative metrics and baseline values for tracking.
- Achievable: Ensure goals are realistic given available resources.
- Relevant: Align with our core values and operational context.
- Time-bound: Include a baseline year and target year.
 - 100% of our employees to be trained on business ethics and information security,
 - 0 incidents of corruption,
 - 0 information security incidents recorded,
 - 0 complaints about inadequate protection of customer data.

📁 SCOPE OF APPLICATION

This Policy applies to all employees working for and on behalf of KTPconTeyor and across all affiliated sites.

📁 ROLES AND RESPONSIBILITIES

The Compliance team is responsible for reviewing and updating this policy. Finally, the Head of Compliance is responsible for signing off this policy.

All Compliance Managers across all KTPconTeyor sites are responsible for making this policy available to all employees.

All employees are responsible for reading, adhering to and acknowledging this policy by signature.

📁 COMMUNICATION

The content of this Policy is communicated to all employees during the onboarding phase. Any changes or updates to this Policy will be communicated immediately via e-mail and as part of the annual Compliance training.

REVIEW MECHANISM

This Policy is reviewed on an annual basis by the owner of the policy together with senior management. Any changes to the document are to be recorded in the review table above.

REPORTING - WHISTLEBLOWER PROTECTION CLAUSE

At KTPconTeyor we are committed to maintaining the highest standards of integrity, transparency, and ethical conduct. Our whistleblower policy is designed to encourage employees, contractors, and stakeholders to report any concerns or suspected violations without fear of retaliation. We grant all whistleblowers anonymity and immunity. We believe that early detection and resolution of issues contribute to a healthy organizational culture and protect the interests of all stakeholders.

By adhering to this policy, we contribute to a transparent and accountable work environment. If you have any concerns or need to report a violation, please follow the procedures outlined in our whistleblower policy.

Any violations of this Code of Conduct may lead to disciplinary actions, up to and including termination of the employee agreement with the KTPconTeyor, in accordance with applicable laws and internal procedures.

Annex 1

RELATED POLICIES

Our People

Labour & Human rights policy
Health & Safety policy
Data Protection policy

Our Company / Assets

Capex policy
Travel & Expenses policy
Credit & Collection policy
Company cars policy
Phone policy
Email policy
IT Security Policy

Our Customers & Partners

Suppliers Code of Conduct
Procurement policy

Our World

Environmental policy
Climate Change policy
Community Engagement policy

Overall Governance

Whistleblower policy

Annex 2

MANAGEMENT BOARD



Orm Verberne
Chief Executive Officer



Tim Van Londersele
Chief Financial Officer



Mirko Trefzer
Chief Commercial Officer



Martin Hentschel
Chief Operations Officer



Xavier Ovize
CEO North America

